UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

FORESCO CO., LTD.,

Plaintiff,

-against-

ALBERT OH,

Defendant.

Case No. 15-CV-02841 (VM)

NOTICE OF PLAINTIFF'S MOTION FOR PRE AND POST JUDGMENT INTEREST

PLEASE TAKE NOTICE that, upon the accompanying *Plaintiff's Memorandum of Law in Support of Its Motion for Pre and Post Judgment Interest*, Plaintiff Foresco Co., Ltd. ("Foresco"), pursuant to Rule 59(e) of the Federal Rules of Civil Procedure and 28 U.S.C. § 1961, will move before the Honorable Victor Marrero of the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 1007, for an order granting its motion requesting that the Court (a) amend the *Judgment*, dated June 5, 2018 (ECF No. 86) (the "Judgment"), in Foresco's favor and against Defendant Albert Oh in the amount of \$1,254,449.90 *to include* \$355,401.87 in pre-judgment interest and (b) to provide, out of an abundance of caution, for an award of post-judgment interest at the rate of 2.2275% to be applied in accordance with 28 U.S.C. § 1961 until such time as Defendant Albert Oh fully satisfies the Judgment.

PLEASE TAKE FURTHER NOTICE that any response to this motion must be served no later than July 10, 2018 at 4:00 p.m. (Eastern Time) on Foresco's undersigned counsel.

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PLEASE TAKE FURTHER NOTICE that Foresco requests the opportunity to be heard by oral argument if this motion is opposed.

Dated: New York, New York June 26, 2018 Respectfully Submitted,

HEATH D. ROSENBLAT, PLLC

By: /s/ Heath D. Rosenblat

Heath D. Rosenblat 101 West 23rd Street, #109 New York, New York 10011 Telephone: (917) 972-4255

Facsimile: (212) 202-5370

E-mail: heath.rosenblat@gmail.com

Counsel for Plaintiff Foresco Co., Ltd.